

1 STEVEN G. KALAR  
Federal Public Defender  
2 NED SMOCK  
Assistant Federal Public Defender  
3 555 - 12<sup>th</sup> Street, Suite 650  
Oakland, CA 94607  
4 Telephone: (510) 637-3518  
5 Counsel for Defendant ANA LISSA REYES

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR-13-0055 YGR  
11 )  
Plaintiff, )  
12 ) STIPULATION AND ORDER TO RESET  
vs. ) STATUS CONFERENCE DATE AND TO  
13 ) EXCLUDE TIME UNDER THE SPEEDY  
ANA LISSA REYES, ) TRIAL ACT  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16  
17 The above-captioned matter is set on March 28, 2013 for a status conference. The parties  
18 request that this Court continue the hearing to April 18, 2013 at 2:00 p.m. and that the Court  
19 exclude time under the Speedy Trial Act between March 28, 2013 and April 18, 2013.

20 This is a case charging Mail Fraud and Tax Evasion over a period of several years. The  
21 parties first appeared before this Court last month. The government has provided disclosures of  
22 extensive reports and thousands of pages of bank records. The defense needs additional time to  
23 review those records as the parties attempt to negotiate a resolution with agreed-upon loss and  
24 restitution amounts. Reviewing and synthesizing the records is necessary as the parties  
25 negotiate, among other things, Sentencing Guidelines calculations. The defense recently  
26 requested additional bank records in an effort to clarify these issues.

1           The parties agree the ends of justice served by granting the continuance outweigh the best  
2 interests of the public and defendant in a speedy trial. Therefore, the parties further stipulate and  
3 request that the Court exclude time between March 28, 2013 and April 18, 2013 in accordance  
4 with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) for adequate  
5 preparation of counsel.

6  
7 IT IS SO STIPULATED:

8 Dated: March 25, 2013

/s/ Ned Smock  
NED SMOCK  
Assistant Federal Public Defender

10  
11 Dated: March 25, 2013

/s/ James Mann for Wade Rhyne  
WADE RHYNE  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 OAKLAND DIVISION

4 UNITED STATES OF AMERICA, ) No. CR-13-0055 YGR  
5 )  
6 Plaintiff, ) ORDER GRANTING STIPULATED  
7 v. ) REQUEST TO RESET STATUS  
8 ANA LISSA REYES ) CONFERENCE DATE AND TO  
9 Defendant. ) EXCLUDE TIME UNDER THE SPEEDY  
10 ) TRIAL ACT  
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The parties jointly requested that the March 28, 2013 status conference in this matter be reset for a status conference on April 18, 2013, and that time be excluded under the Speedy Trial Act between March 28, 2013 and April 18, 2013 to allow for the effective preparation of counsel, taking into account the exercise of due diligence. The defense is engaged in analysis of the evidence and is performing investigation. Accordingly, the Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendant in a speedy trial. Good cause appearing therefor, and pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv),

**IT IS HEREBY ORDERED** that this matter is set for a status conference on April 18, 2013 at 2:00 p.m., and that time between March 28, 2013 and April 18, 2013 is excluded under the Speedy Trial Act to allow for the effective preparation of counsel, taking into account the exercise of due diligence.

DATED: March 26, 2013

  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge